

**THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
MOON GROUP, INC., <i>et al.</i> , ¹)	Case No. 21-11140 (CSS)
)	
Debtors.)	(Jointly Administered)
)	
_____)	Related to Docket Nos. 85 and 86

**CERTIFICATION OF COUNSEL WITH RESPECT TO
STIPULATION AND AGREED ORDER REGARDING MOTION OF DEBTORS AND
DEBTORS-IN-POSSESSION FOR AN ORDER PURSUANT TO F.R. CIV. P. 26(c) AND
DEL. BANKR. L.R. 7030-1(c) QUASHING NOTICE OF
DEPOSITION OF JOHN D. PURSELL, JR.**

I, Michael Busenkell, counsel to KORE Capital Corporation (“KORE”), hereby certify and state as follows:

1. On or about August 19, 2021, KORE served a Notice of Deposition on John D. Pursell, Jr.
2. On or about August 30, 2021, the above-captioned Debtors filed a Motion of Debtors and Debtors-in-Possession for an Order Pursuant to F.R. Civ. P. 26(c) and Del. Bankr. L.R. 7030-1(c) Quashing Notice of Deposition of John D. Pursell, Jr. (D.I. 85) (the “Motion”).
3. On or about August 30, 2021, KORE filed an opposition to the Motion (D.I. 86).
4. KORE and the Debtors have agreed to resolve the Motion on the terms and conditions and have memorialized their agreement on the *Stipulation and Agreed Order Regarding Motion of Debtors and Debtors-in-Possession for an Order Pursuant to F. R. Civ. P. 26(c) and*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each of the Debtors’ respective federal tax identification numbers, are as follows: Moon Group, Inc. (7484); Moon Landscaping, Inc. (3442); Moon Nurseries, Inc. (8411); Moon Site Management, Inc. (0250); Moon Wholesale, Inc. (3232); and Rickert Landscaping, Inc. (3988). The Debtors’ headquarters and mailing address is 145 Moon Road, Chesapeake City, MD 21915.

Del. Bankr. L.R. 7030-1(c) Quashing Notice of Deposition of John D. Pursell, Jr. (the “Stipulation”) attached hereto.

Wherefore, the parties respectfully request the Court to approve the Stipulation and the proposed Order attached hereto.

Dated: September 2, 2021

/s/ Michael Busenkell

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